

# AHMAD KESHAVARZ

Attorney at Law

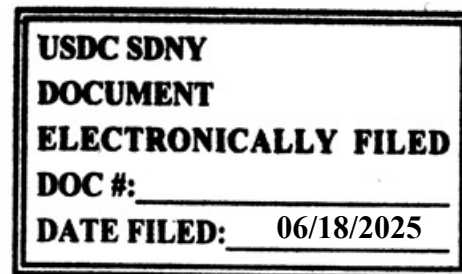
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June 18, 2025

**VIA ECF**

Magistrate Judge Katharine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



**Re: Plaintiff's letter motion for adjournment of pre-motion and initial case management conference.**

*Perpetual Ashare v. Sontag & Hyman, P.C et al.*, Case 1:25-cv-02834-GHW-KHP

Dear Judge Parker:

The undersigned, along with co-counsel Manhattan Legal Services, represents Plaintiff Perpetual Ashare the above-entitled action against alleging violations of the Fair Debt Collection Practices Act and various state law claims against debt collection law firm, Sontag & Hyman, P.C and a principal at the firm, Marc H. Hyman, (collectively the "Attorney Defendants"); and state law claims based on the same nucleus of operative facts against property owners East Harlem Mec Parcel C, L.P., and East Harlem MEC Parcel C Housing Development Fund Corporation and their property management companies, Richman Property Services Inc. and Metro 125, Inc. (collectively the "Landlord Defendants").

The requested adjournment is needed because the undersigned will be out of the country from June 20 to July 6.

Pursuant to § I(c) of Your Honor's Individual Practice Rules, Plaintiff seeks an adjournment of the pre-motion and initial case management conference:

- The original date is June 24, 2025.
- There have been no previous requests for adjournment of this hearing.
- Counsel for the Attorney Defendants, the only ones to date who have appeared, consent to this request.
- The request is to adjourn the conference to one of the following dates agreed upon by counsels for Plaintiff and Attorney Defendants: July 10, July 15 (after 1:30 pm), or July 21 (after 1:30 pm).

The undersigned thanks the Court for its consideration.

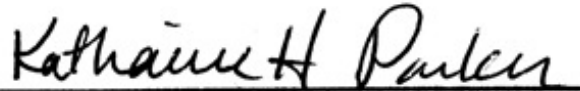
Sincerely,

/s/

Ahmad Keshavarz

**APPLICATION GRANTED:** The Pre-motion/Initial Conference set for 6/24/2025 at 12:00 PM in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to **Thursday, July 10, 2025 at 2:00 p.m.**

**APPLICATION GRANTED**

A handwritten signature in black ink, reading "Katharine H. Parker", written over a horizontal line.

**Hon. Katharine H. Parker, U.S.M.J.**

06/18/2025